

VALZ, HOUSER, KOGUT & BARNES, P.S.

ATTORNEYS AT LAW
Westhill Office Park II, Bldg. 15
1800 Cooper Point Rd. SW
Olympia, Washington 98502
(360) 754-8028
Fax (360) 357-2844
www.kenvalz.com

July 19, 2010

*Ken Valz
Charles H. Houser III
**William P. Kogut
Brian M. Barnes

*Licensed in District of Columbia
** Licensed in Oregon

Michael B. McCarty
US Bankruptcy Trustee
400 Warren Ave.
Suite 411
Bremerton, WA 98377

Re: Electric Vehicle Components, LLC (EVC)

Electric Vehicle Components, Inc. (EVC)
Case No. 10-18151

Dear Mr. McCarty,

FILED
Western District of Washington
at Seattle

JUL 20 2010

MARK L. HATCHER, CLERK
OF THE BANKRUPTCY COURT

This letter will let you know that my office represents 24 consumer/customers of the above businesses.

During the period November, 2009 through April, 2010, these customers tendered about \$ 145,000.00 in cash, credit card charges and checks to the above two businesses for purchase of electric car batteries and supplies. These goods were never delivered.

On June 17, 2010, these consumers filed a Fraud and Consumer Protection Act lawsuit against the two businesses and their owner, James Henry Morrison, in Thurston County Superior Court No. 10-2-1339-1.

Subsequent to the lawsuit, the consumers conducted a deposition of Mr. Morrison. Morrison admitted that he had moved the consumers' purchases and all assets of Electric Vehicle Components, LLC and Electric Vehicle Components, Inc. to two warehouses in Issaquah, Washington in April, 2010. These assets have an estimated value of approximately \$ 350,000.00. In addition, during the same deposition, Mr. Morrison testified that he had transferred approximately \$118,000.00 of Electric Vehicle Components, LLC and Electric Vehicle Components, Inc. cash from the business accounts to his own personal account in April, 2010. In addition, during the same deposition, Mr. Morrison stated that he had sold approximately \$ 30,000.00 of Electric Vehicle Components, LLC and Electric Vehicle Components, Inc. assets during May and June, 2010.

The EVC customers are requesting that you, as the Trustee for these two businesses, require Mr. Morrison to immediately surrender to you the possession of all Electric Vehicle Components, LLC and Electric Vehicle Components, Inc. assets in the Issaquah warehouses and return to your possession the \$ 148,000.00 in cash removed from these two businesses.

July 19, 2010

Michael B. McCarty
US Bankruptcy Trustee
400 Warren Ave.
Suite 411
Bremerton, WA 98377

I am enclosing a copy of the court order entered last Friday in Thurston County Superior Court prohibiting Mr. Morrison from further sales of Electric Vehicle Components, LLC and Electric Vehicle Components, Inc. assets. This order lists the address of one of the warehouses. Mr. Morrison's attorney, Michael Essig, has not yet supplied the address of the second warehouse.

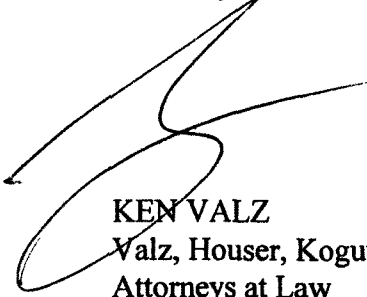
The consumers believe that Mr. Morrison has acted in bad faith by filing this Bankruptcy in an effort to avoid the pending fraud claim against him. It is our request that you protect the rights of the victims in this matter and act promptly to secure the assets.

It is also our request that you allow a representative of the consumers to have access to the warehouses to conduct an inventory. A quick inventory will prevent further sales and pilferage.

I realize that you have a considerable case load but your prompt intervention of this matter will prevent any further abuse of the Bankruptcy Act.

Thank you for undertaking your duties on behalf of the customers who have been the victims of Mr. Morrison and Electric Vehicle Components, LLC and Electric Vehicle Components, Inc.

Sincerely,



KEN VALZ
Valz, Houser, Kogut and Barnes, PS
Attorneys at Law

c: Roy Mann
Dick Wotipka, Attorney for EVC
US Bankruptcy Court File

KV/lcs

X EXPEDITE

x Hearing is set:

Date: _____

Time: 9am

Judge/Calendar: _____ Civil Mot.

IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF THURSTON

ROY MANN, et. al.,
Plaintiffs,

vs.

ELECTRIC VEHICLE
COMPONENTS, LLC,
a Washington Limited Liability
Company,

ELECTRIC VEHICLE
COMPONENTS, INC.,
a Washington Corporation,

JAMES HENRY MORRISON and
"JANE DOE" MORRISON, husband
and wife,

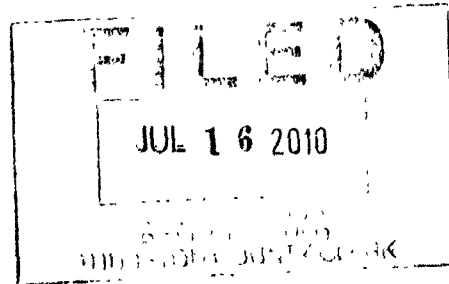
DAVID WAYNE KOIS, II and
"JANE DOE" KOIS, husband and
wife,

MIKE G. WILMON, et. ux. and
TRAVIS TRAVELSTEAD, et. ux.,

Defendants.

NO. 10 2 00952 1

TEMPORARY INJUNCTION



THIS MATTER having come on for hearing and the plaintiffs appearing by and through their attorney, Ken Valz, and the defendant, DAVID WAYNE KOIS, II, appearing in person and the defendants, ELECTRIC VEHICLE COMPONENTS, LLC, ELECTRIC VEHICLE COMPONENTS, INC. and JAMES HENRY MORRISON, appearing in person by and through their attorney, Michael S. Essig, and

Temporary Injunction - I

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1 MIKE G. WILMON, et. ux., appearing by and through his attorney, Sans M. Gilmore
2 and TRAVIS TRAVELSTEAD, et. ux. appearing by and through his attorney, Michael
3 Morgan, and the court having reviewed the files and records herein and having heard the
4 arguments of counsel, it is hereby
5

6 ORDERED as follows:

7 1. ELECTRIC VEHICLE COMPONENTS, LLC and ELECTRIC
8 VEHICLE COMPONENTS, INC. having filed for Bankruptcy proceedings, ~~have the~~
9 ~~right to have all matters stayed in this court pending further orders from the United States~~
10 ~~Bankruptcy Court~~
11 *AS ORDERED ON July 2, 2010*

12 2. Pursuant to CR 65, ~~the remaining~~ parties are temporarily prohibited from any
13 *all*
14 delivery, transfer, or movement of all products including batteries, that were received
15 from or are being or will be received for the parties at International Freight and any other
16 property of ELECTRIC VEHICLE COMPONENTS, LLC or ELECTRIC
17 VEHICLE COMPONENTS, INC. located in warehouses in Issaquah, Washington at
18 the addresses of Issaquah, Washington and
19

20 Issaquah Business Park at 1085 12th Ave. NW, Suite D-6, Issaquah, Washington 98027.
21 *as outlined in the court's order of 7/2/10*
22
23
24
25

Temporary Injunction - 2

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1 This restraining order includes **DAVID WAYNE KOIS, II,**
2 **MIKE G. WILMON, TRAVIS TRAVELSTEAD and JAMES HENRY**
3 **MORRISON** and any person, employee or agent acting under their direction and those
4 persons in active concert or participation with them, pursuant to CR 65(d).
5

6 2. Pursuant to CR 65(c), the security bond in the amount of \$10,000.00 filed by
7
8 the plaintiffs shall remain in the court registry.

9
10 3. The parties shall meet and select an individual or individuals to undertake an
11 Inventory and valuation of the assets described in paragraph 1. This Inventory shall be
12 completed and filed with the court by July 30, 2010. Other than the entry of these
13 individuals into the above described warehouses, none of the above parties shall enter
14 these warehouses pending further orders of this court. The individuals undertaking the
15 Inventory shall take measures to assure that the warehouses are sealed after such
16
17 Inventory.
18
19
20

21 4. This matter will be ^{heard} ~~reviewed~~ on
22

23 July 30, 2010. for consideration
24 of the preliminary injunction
25 hearing scheduled for today.

Temporary Injunction - 3

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5.

DONE IN OPEN COURT this 16 day of July, 2010.

JUDGE

Presented by:

KEN VALZ WSBA#12068

Valz, Houser, Kogut and Barnes, PS
Attorneys for Plaintiffs

Agreed as to Form and Order:

MICHAEL S. ESSIG WSBA#30105

O'Brien Law Firm
Attorneys for Defendants Morrison, et. al.

DAVID WAYNE KOIS, II
Defendant

SANS M. GILMORE WSBA#

Attorneys for Defendant Travis Travelstead

MICHAEL MORGAN WSBA #
Attorneys for Mike G. Wilmon

Temporary Injunction - 4

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